

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

RowVaughn Wells, Individually and as)	
Administratrix of the Estate of Tyre Deandre)	
Nichols, Deceased,)	
)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 2:23-CV-02224-SHL
)	JURY DEMAND
The City of Memphis, Tennessee; Chief Cerelyn)	
Davis; Emmitt Martin III;)	
Demetrius Haley; Justin Smith;)	
Desmond Mills, Jr.; Tadarrius Bean;)	
Preston Hemphill; Robert Long;)	
JaMichael Sandridge; Michelle Whitaker;)	
DeWayne Smith,)	
)	
Defendants.)	

**AMENDED NOTICE OF VIDEOTAPED
DEPOSITION OF MARCUS JACKSON**

PLEASE TAKE NOTICE that Defendant the City of Memphis (the “City”) will take the oral and videotaped deposition of Marcus Jackson on August 20, 2025 beginning at 9:30 A.M. PDT at the office of CC Reporting & Video, 440 East Broadway, Suite 160, Eugene, OR 97401.

The deposition will be taken before a person duly authorized by law to administer oaths. The deposition will be recorded by video and stenographic means. This deposition is being taken pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure for the purpose of discovery, for use at trial, and for such other purposes as are permitted under the rules of the Court.

Dated: August 11, 2025

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

s/ Bruce McMullen

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*Attorneys for Defendant City of Memphis,
Chief Cerelyn Davis in her Individual
Capacity, and Lt. DeWayne Smith as Agent
of the City of Memphis*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon all counsel of record, and the Guardian Ad Litem via email on August 11, 2025.

s/ Bruce A. McMullen

Bruce A. McMullen